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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

MARIELA AGUILAR VELAZQUEZ, on)	Case No. 2:21-cv-02375-MCE-DB
behalf of herself and all others similarly)	
situated,)	
)	JOINT STATUS REPORT AND
Plaintiff,)	STIPULATION AND ORDER TO FURTHER
)	<u>STAY CASE DEADLINES</u>
vs.)	
)	The Honorable Morrison C. England, Jr.
ALLY BANK,)	
)	
Defendant.)	
)	
)	

1 Pursuant to the Court's order (ECF No. 18), Defendant, Ally Bank, and Plaintiff, Mariela
2 Aguilar Velazquez (together, the "Parties"), respectfully submit this joint report on the status of the
3 Parties' settlement discussions.

4 On January 27, 2022, the Court entered an order granting the Parties' Stipulation and Order
5 Pursuant to Local Rule 144(a) For Extension of Time to Respond to Complaint (ECF No. 11).
6 Subsequently, on March 16, 2022 and April 22, 2022, the Court entered orders granting the Parties'
7 Stipulation and Order to Stay Case Deadlines (ECF Nos. 16, 18) to enable the Parties to engage in
8 settlement discussions and explore resolution of the case without litigation.

9 The Parties' have exchanged an initial settlement offer and settlement discussions are ongoing.
10 Accordingly, the Parties believe that good cause exists for the Court to stay case deadlines for an
11 additional 45 days, which will conserve the Court's and Parties' resources and allow the Parties further
12 time to discuss a potential settlement and, if necessary, conduct confirmatory discovery. Accordingly,
13 the Parties respectfully request that the Court enter an order extending the case deadlines as follows:

14
15 1. The case is stayed to enable the Parties to continue to engage in settlement
16 discussions.

17 2. Defendant's deadline to file a response to the Complaint shall be extended from
18 May 31, 2022 to July 15, 2022; Plaintiff's deadline to file any opposition to the motion shall be August
19 15, 2022; Defendant's deadline to file any reply in support of the motion shall be September 12, 2022;
20 and the hearing on the motion shall be scheduled for September 29, 2022.

21 3. In the event the Parties continue to make progress towards settlement and
22 require a further stay, the Parties shall submit to the Court an additional joint report concerning the
23 status of the Parties' efforts to resolve the case and requesting a further stay on or before July 8, 2022.

24 4. Nothing in this stipulation is intended, or shall be deemed, to waive or otherwise
25 prejudice any Party's rights, claims, defenses, motions, or objections (whether to jurisdiction, service,
26 or otherwise) in this case.
27
28

1 Dated: May 24, 2022

Respectfully submitted,

2 /s/ Diane L. McGimsey

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29 IT IS SO ORDERED.

30 Dated: May 31, 2022

31 
32 MORRISON C. ENGLAND, JR.
33 SENIOR UNITED STATES DISTRICT JUDGE